

'468 Patent Claim Terms	Honeywell's Proposed Construction	Support
Claim 1¹		
1. A method of providing a data update to a vehicle, the method comprising the steps of:		
obtaining and storing said data update at a <u>system server</u> ;	System server: Honeywell believes this claim phrase does not require construction, but if the Court is inclined to construe the phrase, its plain meaning is "a device or computer system or software that includes an administrative application/program, a database and an interface application."	'468 Patent. '468 fig. 1; <i>id.</i> col.3 ll.57-59 ("System server 102 suitably includes an administrative application/program 106, a database 104 and an interface application 108."); and <i>id.</i> col.4 ll.38-43 ("The various components of system server 102 may be assembled in any manner. Database 104, application 106 and interface 108 may be provided on a single computer or workstation, for example. Alternatively, a data network could couple multiple computing resources to each other to provide the functionality of the various components.")
forwarding said data update at a system server to a <u>vehicle server</u> via a <u>data connection</u> ;	Vehicle server: any hardware or software device that is capable of receiving data updates from the system server and loading the updates in a component.	'468 Patent. '468 col.5 ll.19-22 ("Vehicle server 116 is any hardware or software device that is capable of receiving data updates from system server 102 and loading the updates in component 118.")

¹ Construed terms are noted only in the first instance for each claim series in which the term is used, but the same construction applies to all other instances in each claim series unless noted otherwise.

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	<p>Data connection: Honeywell believes this claim phrase does not require construction, but if the Court is inclined to construe the phrase, its plain meaning is "any type of wireless, optical or electrical data connection."</p>	<p>'468 Patent. '468 col.5 ll.15-18 ("An appropriate receiver may include a gatelink receiver as discussed above, or any other type of wireless, optical or electrical data connection.")</p>
<p><u>loading said data update from said vehicle server into a component at said vehicle</u>; and</p>	<p>Component: any avionics or other aircraft device such as a flight management computer, flight management system, global positioning system, navigation computer or the like.</p> <p>Loading said data update from said vehicle server into a component at said vehicle: Honeywell believes this claim phrase does not require construction, but if the Court is</p>	<p>'468 Patent. '468 col.1 ll.40-49 ("Accordingly, government agencies such as the United States Federal Aviation Administration (FAA) typically require that aircraft update navigation databases on a regular basis, such as every twenty-eight days. Other components (such as global positioning systems (GPS)) may also make use of periodic data upgrades."); <i>id.</i> col.5 ll.46-49 ("Component 118 is any avionics or other aircraft device such as a flight management computer (FMC), flight management system (FMS), global positioning system (GPS), navigation computer or the like.")</p> <p>'468 Patent. '468 col.5 ll.39-45 ("Data loading functionality may be accomplished with hardware and software available from, for example, ILC Data Service Corp. Such hardware and software may include, for example, ARINC 615 data loader software and/or an ILC 429 card available from ILC,</p>

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	inclined to construe the phrase, its plain meaning is "loading the data update from the vehicle server into the vehicle component."	or any other implementation of the ARINC 615 or other appropriate data loader protocols.")
<u>verifying from said vehicle server to said system server via said data connection that said loading step completed successfully.</u>	Verifying from said vehicle server to said system server via said data connection that said loading step completed successfully: Honeywell believes this claim phrase does not require construction, but if the Court is inclined to construe the phrase, its plain meaning is "transmitting a signal from the vehicle server to the system server via a data connection indicating that the loading step completed successfully."	'468 Patent. '468 col.9 ll.22-25 ("When the load is complete, a CRC check (such as a CRC routine set forth in the ARINC 615 standard) is executed by component 118 or vehicle server 116, as appropriate, to verify that the data update was properly loaded.")
Claim 2		
2. The method of claim 1 wherein said data connection comprises a wireless data connection.		
Claim 7		

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<p>7. A <u>digital storage medium</u> having computer-executable instructions stored thereon, wherein said computer-executable instructions are <u>operable to execute the method</u> of claim 2.</p>	<p>Digital storage medium: Honeywell believes this claim phrase does not require construction, but if the Court is inclined to construe the phrase, its plain meaning is "a medium that can store digital information."</p> <p>Operable to execute the method: Honeywell believes this claim phrase does not require construction, but if the Court is inclined to construe the phrase, its plain meaning is "able to cause one or more applications, processes, processors or devices to perform the steps."</p>	<p>WEBSTER'S NEW TWENTIETH CENTURY DICTIONARY, UNABRIDGED 1118 (2nd ed. 1979) (defining "medium" as "...3. any means, agency, or instrumentality; as, radio is a <i>medium</i> of communication.")</p> <p>'468 Patent. '468 col.6 ll.56-60 ("FIG. 3 is a more detailed flowchart showing exemplary processes for updating data and processing status that may be executed at system server 102 by administrative application 106."); <i>id.</i> col.7 l. 63 – col. 8, l. 4 ("With continued reference to FIG. 3, an exemplary process 350 for processing the status of a vehicle following a load operation suitably includes determining whether a load status is received (step 352) and updating the status information (step 354) for a number of aircraft or other vehicles (step 356). A daemon or other process running on system server 102 in conjunction with administrative program 106 and/or interface program 108 may execute such a process 350.")</p>
Claim 9		
9. A method of providing a data update		

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to a vehicle, the method comprising the steps of:		
receiving said data update at a <u>system server</u> ;	System server: <i>see claim 1.</i>	
transmitting said data update to a <u>vehicle server</u> via a <u>data connection at a pre-determined time</u> ; and	Vehicle server: <i>see claim 1.</i> Data connection: <i>see claim 1.</i> At a pre-determined time: Honeywell believes this claim phrase does not require construction, but if the Court is inclined to construe the phrase, its plain meaning is “at a time that is determined in advance, or that is determined by a program in accordance with pre-determined rules based on user inputs and/or data in a database”	‘468 Patent. ‘468 col.6, ll.12-16 (“Time of distribution to a particular vehicle may be determined by administrative program 106 in accordance with pre-determined rules based upon user inputs and data in database 104, for example, or according to any other scheme.”)
<u>receiving a confirmation from said vehicle server via said data connection when said data update is successfully</u>	Receiving a confirmation from said vehicle server via said data connection when said data update is successfully loaded: Honeywell believes this claim phrase does not require	‘468 Patent. ‘468 col.9 ll.22-25 (“When the load is complete, a CRC check (such as a CRC routine set forth in the ARINC 615 standard) is executed by component 118 or vehicle server 116, as appropriate, to verify that the data update was properly loaded.”); and <i>id.</i> col.9 ll.41-45 (“Vehicle server 116 may also

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<u>loaded</u> .	construction, but if the Court is inclined to construe the phrase, its plain meaning is "receiving a signal from the vehicle server to the system server via the data connection indicating that the loading step completed successfully."	notify system server 102 of the successful load by sending information such as the data update identifier, version number, user identification, date loaded and/or load status of the load.")
Claim 12		
12. The method of claim 9 wherein said data connection comprises a wireless data connection.		
Claim 13		
13. A <u>digital storage medium</u> having computer-executable instructions stored thereon, wherein said computer-executable instructions are <u>operable to execute the method</u> of claim 9.	Digital storage medium: <i>see claim 7.</i> Operable to execute the method: <i>see claim 7.</i>	

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Claim 15		
<p>15. A <u>digital storage medium</u> having computer-executable instructions stored thereon, wherein said computer-executable instructions are <u>operable to execute the method</u> of claim 12.</p>	<p>Digital storage medium: <i>see claim 7.</i></p> <p>Operable to execute the method: <i>see claim 7.</i></p>	